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August 13, 2021

VIA ECF

Honorable Joanna Seybert
United States District Judge
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

Re: IN RE: HAIN CELESTIAL HEAVY METALS BABY FOOD LITIGATION
Case No. 2:21-CV-00678-JS-AYS

Dear Judge Seybert:

I am counsel for the recently filed case, *Garces, et al. v. The Hain Celestial Group, Inc.*, Case No. 1:21-cv-4459-ENV-RER, on behalf of 16 plaintiffs covering 15 states.

I submit this letter in support of the leadership motion filed by the Stewart Movants. I am the founder and managing partner of Zimmerman Law Offices, P.C. with over 25 years of experience in class action and complex litigation. Based on my experience, my communications with the counsel for the Stewart Movants, and the filings in this consolidated action, I am confident that this group of counsel is best suited to lead this case as the Interim Lead Counsel. While all of the movants for Interim Lead Counsel are undoubtedly qualified, I have reviewed the opening memorandum of law in support of the Stewart Movants' motion for Interim Lead Counsel and an Executive Committee, and their qualifications, leadership, and diversity satisfy all the criteria that render them the best group of counsel to spearhead this litigation. Indeed, rather than moving for Interim Lead Counsel myself, I believe that supporting the Stewart Movants' application will best serve the interests of the plaintiffs (including my clients) and the class.

The Stewart Movants have extensive background in the area of complex class actions on behalf of the consumers, individually and collectively, and moreover, their impressive experience in similar litigation involving pet food products contaminated with heavy metals undoubtedly sets them apart from any of the other leadership applicants. As a group including the first and other early-filed cases against Defendant, they have shown excellent leadership and case management skills since the inception, taking the necessary steps to advance this case in the way that would best benefit all plaintiffs and the class.

I have no doubt that this group of counsel will continue to make the best decisions to effectively and efficiently manage this case, working cooperatively with the other counsel in this consolidated case.

Therefore, I respectfully request that the Court grant the Stewart Movants' leadership motion.

Sincerely,

/s/ Thomas A. Zimmerman, Jr.

Thomas A. Zimmerman, Jr.